

Appl. No. 09/994,634
Reply to Office Action Dated May 31, 2007

REMARKS

Claims 1-3, 5-14, and 21-27 are currently pending in the application. Claims 1, 9 and 25 are independent. Applicants respectfully request reconsideration of the present application.

Rejection of Claims 1-3 and 7-8

Claims 1-3 and 7-8 stand rejected as being unpatentable over Singkornrat in view of Jung and further in view of Jaaskelainen. Applicant respectfully disagrees.

With respect to claim 1, claim 1 is patentable over Singkornrat in view of Jung and further in view of Jaaskelainen for two reasons.

First, none of the references disclose “a computer wireless transceiver connected to a computer main unit; a monitor wireless transceiver configured to receive video data from ... said computer main unit via said computer wireless transceiver; a computer display device; [and] a display driver **coupled between** said computer display device and said monitor wireless transceiver, **wherein said display driver is configured to receive from the monitor wireless transceiver video data transmitted from the computer wireless transceiver, translate the received video data to produce translated video data, and provide the translated video data to the computer display device,**” as is required by claim 1 (emphasis added).

Applicant admits that Singkornrat discloses: a computer wireless transceiver (see Singkornrat figure 2 elements 106/112), a computer main unit (see Singkornrat figure 1 element 12), a monitor wireless transceiver (see Singkornrat figure 3 elements 116/124), a computer display device (see Singkornrat figure 1 element 24), and a display driver that is configured to convert data (see Singkornrat figure 2 element 102). However, applicant respectfully submits that Singkornrat does not teach or suggest, among other things, that the display driver 102 is “**coupled between** said computer display device and said monitor wireless transceiver,” as is explicitly required by claim 1. Rather, Singkornrat teaches that the display driver 102 is coupled between the computer main unit 12 and the computer wireless transmitter 106. This is a significant distinction.

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Neither Jung nor Jaaskelainen makes up for the deficient teachings of Singkornrat. Neither Jung nor Jaaskelainen teach or suggest a “wireless transceiver configured to receive from said computer main unit via said computer wireless transceiver video data corresponding to a video signal.” and, therefore, can not, by definition, teach or suggest a display driver coupled between a computer display device and a monitor wireless transceiver.

Applicant admits that Jung discloses a “radio transceiver” (see Jung at figure 1). However, the “radio transceiver” disclosed in Jung is not a “wireless transceiver configured to receive from said computer main unit via said computer wireless transceiver video data corresponding to a video signal” because the “radio transceiver” disclosed in Jung does not receive video data from said computer main unit. Rather, the radio transceiver merely receives data wirelessly from the wireless headphone unit. That is, the “radio transceiver” does not receive anything from the computer main unit. Moreover, the data received from the wireless headphone unit does not include video data corresponding to a video signal, but rather includes only “a remote control signal for output to monitor 30, which includes monitor power control data, headphone speaker control data, and monitor speaker control data.” *Jung at col. 2, lines 48-51*. Accordingly, the “monitor wireless transceiver” of claim 1 does not read on the “radio transceiver” disclosed in Jung.

Accordingly, none of the references teach or suggest “a display driver coupled between said computer display device and said monitor wireless transceiver, wherein said display driver is configured to receive from the monitor wireless transceiver video data transmitted from the computer wireless transceiver, translate the received video data to produce translated video data, and provide the translated video data to the computer display device.” Therefore, a *prima facie* case of obviousness can not be made because in order to make a *prima facie* case of obviousness the references must disclose all of the claimed elements. Applicant, therefore, respectfully requests that the rejection of claim 1, and claims 2-3 and 7-8, which depend from claim 1, be withdrawn.

Second, there is no suggestion or motivation to combine the references. In order for the Office to establish a *prima facie* case of obviousness, there must be “some suggestion or motivation, either in the references themselves or in the knowledge generally available to

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one of ordinary skill in the art, to modify the reference or to combine reference teachings.” MPEP §2143; see also *In re Kahn*, 441 F.3d 977, 986 (Fed. Cir. 2006) (noting that “mere identification in the prior art of each element is insufficient to defeat the patentability of the combined subject matter as a whole”).

The Office contends, “it would have been obvious to ... incorporate the teachings of Jaaskelainen into ... Singkornrat and Jung in order to convert the signal to RGB video in order to display on the monitor.” Office Action at page 9, emphasis added.

Applicant respectfully submits that there is no motivation or suggestion to convert the signal to RGB because, when the signal is output from the computer, the signal is already in RGB format. This is clearly shown in FIG. 2 of Singkornrat, which figure is reproduced below, and in FIG. 1 of Jung, which is also reproduced below.

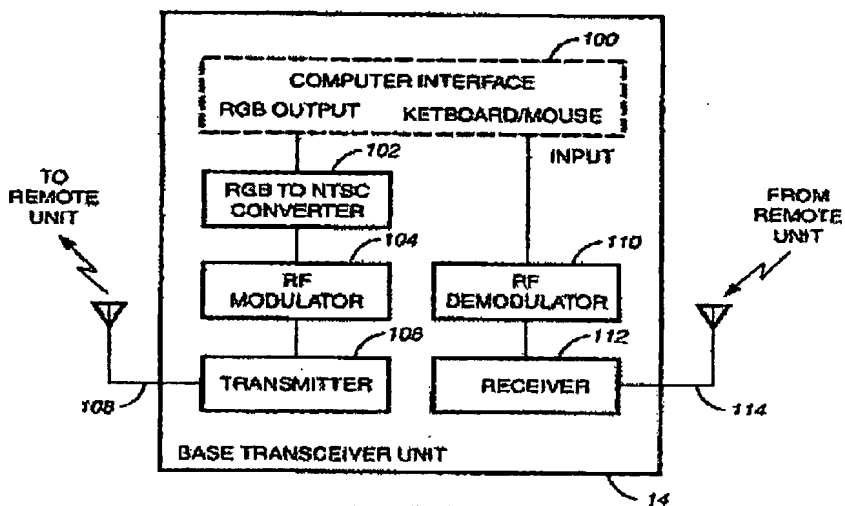
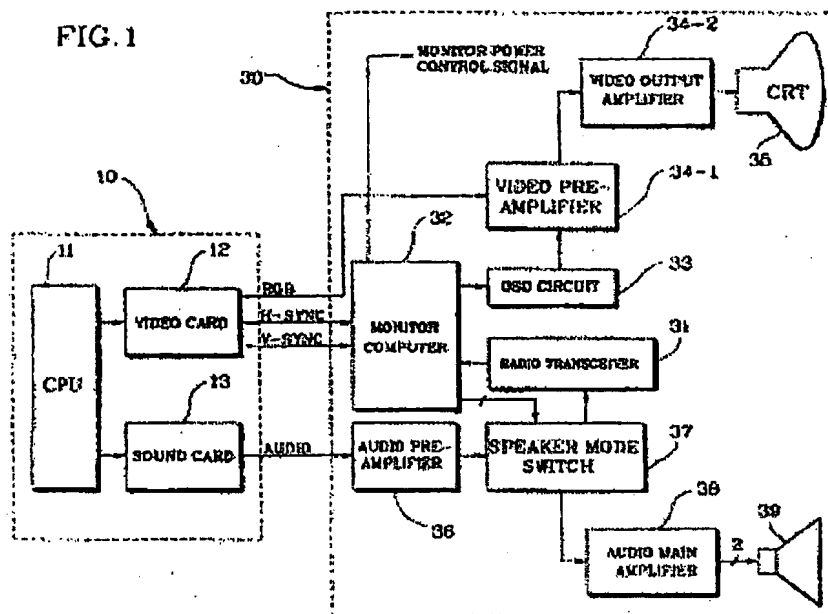


FIG. 2

Singkornrat FIG. 2

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JUNG FIG. 1

As illustrated in figure 2 of Singkornrat, the computer outputs an RGB signal to the base unit 14. The base unit 14 then converts the RGB signal to an NTSC signal. This NTSC signal is then modulated and transmitted to the remote unit 16. The remote unit 16 includes a receiver for receiving the signal transmitted from the base unit 14 and for demodulating the signal to recover the NTSC signal, which signal is then sent to the TV 24 via the switch box 118.

Similarly, as illustrated in figure 1 of Jung, Jung merely discloses a computer 10 connected to a monitor 30. The computer 10 includes a video card 12 that outputs an RGB signal to the monitor 30. The monitor 30 includes an OSD circuit 33 that outputs an RGB signal. The monitor 30 also includes a video pre-amplifier 34-1 and a video output amplifier 34-2, both of which function to amplify the RGB signal outputted from the video card 12 and OSD circuit 33. The output of the video output amplifier 34-2 is connected to an input of a CRT 35.

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With respect to Singkornrat, there is simply no good reason for incorporating into the remote unit 16 a driver that is configured to translate to an RGB signal the NTSC signal extracted by receiver 116. If the display device that is coupled to the remote unit 16 requires an RGB signal (as opposed to an NTSC signal), then the most obvious, most cost effective, and simplest solution is to not use the RGB to NTSC converter in the base unit 14, as opposed to incorporating into the remote unit 16 a device to convert the signal back to RGB from NTSC. In fact, this obvious and simple solution is exactly what is taught by Singkornrat. Specifically, Singkornrat states, “[a]lternatively, the base unit [14] can include a modulator that modulates the carrier wave with RGB signals without using the RGB to NTSC converter 102. The remote receiver unit [16] would then be adapted to demodulate the received signals to extract RGB signals and a monitor having an RGB input could be used. This will result in a better resolution.” Singkornrat at Col. 2, lines 34-40 (emphasis added). Singkornrat could not have been more clear. If one wants to use a monitor having an RGB input, as opposed to an NTSC input, then one would simply not use the RGB to NTSC converter that is in the base unit 14. Thus, contrary to the Office’s assertion, there is simply no good or valid reason for including into the remote unit 16 a device for converting the NTSC signal to RGB. Similarly, with respect to Jung, there is simply no good reason to modify the system in Jung to include a device that “convertes the signal to RGB” because Jung already has a device that performs the conversion (i.e., the video card and the OSD circuit).

Hence, it is not obvious to incorporate the teachings of Jaaskelainen into Singkornrat and Jung in order to “convert the signal to RGB video.” For this additional reason, Applicant respectfully requests that the rejection of claim 1, and claims 2-3 and 7-8, which depend from claim 1, be withdrawn.

Rejection of Claim 9-11, 21-23

Claims 9-11, and 21-23 stand rejected as being obvious over Singkornrat in view of Lazaridis (U.S. Patent. No. 7,000,001). Applicant respectfully disagrees.

With respect to claim 9, claim 9 is patentable over Singkornrat in view of Lazaridis for two reasons.

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First, neither Singkornrat nor Lazaridis, considered alone or in combination, teach or suggest all of the elements of claim 9. The Office correctly states that Singkornrat "fails to teach a ... communication [that] includes data and [the] unique address [of the computer main unit]." The Office incorrectly contends, however, that Lazaridis makes up for the deficient teachings of Singkornrat.

In support of its contention that Lazaridis discloses a "communication [that] includes .. said unique address [of the computer main unit]," the Office cites to col. 7, lines 65-67, which is reproduced below for the convenience of the Examiner.

One or more printers coupled to the computer network, wherein each printer has a unique printer address on the computer network.
Lazaridis at col. 7, lines 65-67.

Significantly, nowhere does the above portion of Lazaridis (or any portion of Lazaridis for that matter) teach or suggest a "**communication [that] includes ... said unique address [of the computer main unit]**." Rather, Lazaridis merely disclose that each printer on a network has a unique printer address. But nowhere does Lazaridis disclose a monitor sending a communication to a computer main unit, wherein the communication "includes data and said unique address [of the computer main unit]." For this reason alone, the rejection of claim 9, and claims 10-11 and 21-23, which depend from claim 9, should be withdrawn.

Second, there is no motivation or suggestion to combine Singkornrat with Lazaridis. The Office states, "it would have been obvious ... to incorporate the teachings of Lazaridis into view of [sic] Singkornrat **in order to exchange the data between the CPU and the printer**." Office Action at page 12 (emphasis added). The Office's rationale for why it would be obvious to combine the references is erroneous because the system disclosed in Lazaridis is **fully capable** of exchanging data between the CPU and a printer. Thus, there is no advantage to adding the teachings of Singkornrat to Lazaridis. Accordingly, there is no motivation or suggestion to combine the references. For this additional reason the rejection of claim 9, and claims 10-11 and 21-23, which depend from claim 9, should be withdrawn.

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Rejection of claims 25-26

Claims 25-26 stand rejected as being unpatentable over Riazi (U.S. Patent. No. 6,748,005) in view of Jung (U.S. Patent. No. 6,041,225) and further in view of Jaaskelainen (U.S. Patent. No. 5,963,191). Applicant respectfully disagrees.

In connection with the rejection of claim 25, the Office asserts that Jung discloses "data translation means coupled between said computer display and said monitor wireless transceiver." However, as discussed above in connection with claim 1, Jung does not disclose this feature. Rather, Jung discloses a radio transceiver that merely receives data wirelessly from and transmits data wirelessly to the wireless headphone unit. Accordingly, Applicant respectfully requests that the rejections of claim 25 and claim 26, which depends from claim 25, be withdrawn.

Rejection of Claim 5-6

Claims 5-6 depend from claim 1, and, therefore, are patentable for at least the reason given above with respect to claim 1.

Rejection of Claims 12-13, 14 and 24

These claims depend from claim 9, and, therefore, are patentable for at least the reason given above with respect to claim 9.

Rejection of Claim 27

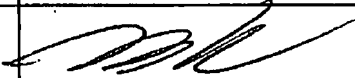
Claim 27 depends from claim 25, and, therefore, is patentable for at least the reason given above with respect to claim 25.

CONCLUSION

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider all presently outstanding objections and rejections, and that they be withdrawn. Applicant believes that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance.

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If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

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